

Cause No. DCCV16-356-349A

CITY OF PALESTINE, TEXAS,  
*Plaintiff,*

IN THE DISTRICT COURT

VS.

JERRY LAZA,

*Defendant.*

JERRY LAZA,

*Counter-plaintiff,*

ANDERSON COUNTY, TEXAS

VS.

CITY OF PALESTINE, MIKE ALEXANDER,  
AND RONALD STUTES,

*Counter-defendants.*

349th JUDICIAL DISTRICT

**COUNTER-DEFENDANT CITY OF PALESTINE’S**  
**NOTICE OF REMOVAL TO FEDERAL COURT**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§1441, and 1446, City of Palestine, Texas (“Defendant” or “City of Palestine”), Defendant named in the above-styled and severed civil action, has filed notice of removal in the United States District Court for the Eastern District of Texas, Tyler Division, a copy of which is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that this Notice of Filing, as well as the Notice of Removal attached hereto as **Exhibit A**, has been provided to all adverse parties and filed with the 349<sup>th</sup> Judicial District Court of Anderson County, Texas, thereby effecting the removal of the action to the United States District Court for the Eastern District of Texas, pursuant to 28 U.S.C. §1446(d).

Respectfully submitted,

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By: /s/ J. Matt Rowan  
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ATTORNEYS FOR CITY OF PALESTINE

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been served via the electronic service provider upon Defendant/ Counter Plaintiff's counsel of record, Robert Hindman, 5620 Old Bullard Road, Suite 105, Tyler Texas 75703-4358 (attorney@tyler.net), and on James C. Mosser, 2805 Dallas Parkway, Suite 222, Plano, Texas 75093 (CourtDocuments@MosserLaw.com) on September 18, 2017.

/s/ J. Matt Rowan  
J. Matt Rowan